

Exhibit 13

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a year ago.

MR. EPSTEIN: Okay.

Q. When it was filed over a year ago, how did you believe that Ms. Larson profited from The Kindest and its selection by the BBF as the featured short story in 2018?

A. This relates to my earlier testimony about profit. I'm not using the term "profit." I, as I speak in my testimony for the deposition today, I'm not using profit as a legal term of art because I'm not a lawyer. But when I consider the value that any publication, especially an auspicious one for an honor like One City One Story bestows upon its author. What I mean by "profit," is that value derived by that author enjoying that platform. And as you've said yourself, allegedly winning this contest, right, so that's what I'm referring to, that kind of value, the value of having been selected, the value of getting this platform. I would call it the type of profit in a layperson's sense.

Q. So we had you limit your answer to April 24, 2020. How would you -- how do you believe that Ms. Larson profited from The Kindest

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MS. ELOVECKY: I'm restating my other objection to the question, which is objection, you can answer to the extent that you're able only inasmuch as you understand the terms embedded in the question.

A. My answer is: "Yes."

Q. In what way has Ms. Larson profited as we sit here today, September 22, 2021?

A. Well, it's difficult for me to answer entirely because of the volume of documents received in discovery. And it has been difficult for me to spend time with every bit of the massive production. And it also has been very painful and upsetting because a lot of the correspondence is cruel and personal attacks against me.

But when I say "yes," one thing I'm referring to that I know now that I did not know at the time of our counterclaim filing is that Sonya's platform for that story entitled her to blind, as I see it, blind unprincipled support from people in our writing community. And because I didn't have such a platform, and I wasn't perceived to have such connections, many